

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO.
	:	
v.	:	DATE FILED: _____
	:	
CHARLES BONNER	:	VIOLATIONS:
	:	18 U.S.C. § 1344 (bank fraud - 1 count)
	:	18 U.S.C. § 1028(a)(7), (b)(1)(D), and
	:	(c)(3)(A) (identity theft – 1 count)
	:	18 U.S.C. § 2 (aiding and abetting)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. At all times material to this indictment, Wachovia Bank was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation, certificate number 33869-9.

2. From in or around September 2003 through in or around March 2004, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

CHARLES BONNER

knowingly executed and attempted to execute, and aided and abetted the execution and attempted execution of, a scheme to defraud Wachovia Bank and to obtain monies owned by and under the care, custody, and control of Wachovia Bank, by means of false and fraudulent pretenses, representations, and promises.

THE SCHEME

3. Defendant CHARLES BONNER and others known and unknown to the grand jury stole Wachovia Bank account information of elderly victims known to the grand jury and identified here as B.P., W.S., C.M., S.B., and J.B., and used that information to withdraw funds, totaling approximately \$84,900, from the accounts of the elderly victims.

4. To withdraw the funds, defendant CHARLES BONNER and others known and unknown to the grand jury did the following: (1) they unlawfully obtained Wachovia Bank account information of the elderly victims; (2) they had fraudulent photographic identifications produced in the names of the elderly victims with the photograph of BONNER; and (3) they drove to numerous branches of Wachovia Bank where BONNER used the fraudulent photographic identifications to pose as the elderly victims and present to the tellers withdrawal slips for between \$1,500.00 and \$4,500.00 for the victims' accounts. The tellers then provided BONNER with the funds as requested, and BONNER shared the fraud proceeds with his co-schemers.

5. On or about each of the dates set forth below, defendant CHARLES BONNER fraudulently made the following withdrawals from the victim accounts at Wachovia Bank:

DATE	AMOUNT	VICTIM	WACHOVIA BRANCH
09/19/03	\$ 4,500.00	B.P.	Overbrook
10/30/03	\$ 1,700.00	W.S.	Jefferson
10/30/03	\$ 1,500.00	W.S.	Independence
10/31/03	\$ 3,000.00	W.S.	Centre Square

DATE	AMOUNT	VICTIM	WACHOVIA BRANCH
10/31/03	\$ 1,800.00	W.S.	Broad and Walnut Streets
11/07/03	\$ 2,500.00	W.S.	Fairhill
11/07/03	\$ 1,500.00	W.S.	Nicetown
11/13/03	\$ 3,000.00	W.S.	Wyoming
11/15/03	\$ 3,000.00	W.S.	Germantown
11/17/03	\$ 3,500.00	W.S.	Nicetown
11/19/03	\$ 3,500.00	W.S.	Nicetown
11/22/03	\$ 3,500.00	W.S.	Germantown
11/25/03	\$ 3,500.00	W.S.	Nicetown
11/28/03	\$ 3,500.00	W.S.	Nicetown
11/29/03	\$ 3,500.00	W.S.	Germantown
12/02/03	\$ 1,500.00	W.S.	Nicetown
02/20/04	\$ 2,800.00	C.M.	Jefferson
02/21/04	\$ 2,500.00	C.M.	Germantown
02/21/04	\$ 3,500.00	C.M.	Upper Darby
03/03/04	\$ 2,600.00	J.B.	Fairhill
03/05/04	\$ 2,800.00	J.B.	Fairhill
03/06/04	\$ 3,500.00	J.B.	Germantown
03/10/04	\$ 2,400.00	J.B.	Fairhill
03/13/04	\$ 2,700.00	J.B.	Germantown
03/15/04	\$ 2,700.00	S.B.	Allegheny
03/17/04	\$ 2,900.00	J.B.	Fairhill

DATE	AMOUNT	VICTIM	WACHOVIA BRANCH
03/17/04	\$ 2,900.00	S.B.	Allegheny
03/19/04	\$ 2,800.00	S.B.	Allegheny
03/19/04	\$ 2,800.00	J.B.	Fairhill
03/20/04	\$ 3,000.00	J.B.	Germantown

In violation of Title 18, United States Code, Sections 1344 and 2.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. At all times material to this indictment, Wachovia Bank was an organization that operated in interstate commerce and whose activities affected interstate commerce.

2. From in or around September 2003 through in or around March 2004, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

CHARLES BONNER

knowingly and without lawful authority used means of identification of other persons with the intent to commit, and to aid and abet, violations of Federal law, that is, bank fraud, in violation of 18 U.S.C. § 1344, by gaining access to, and withdrawing funds from, the Wachovia Bank accounts of victims known to the grand jury and identified here as B.P., W.S., C.M., S.B., and J.B., thereby obtaining anything of value aggregating \$1,000 or more, that is, approximately \$84,900, in a one-year period, and thereby affecting interstate commerce.

In violation of Title 18, United States Code, Section 1028(a)(7), (b)(1)(D), and (c)(3)(A), and 2.

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney